## REMARKS

Claims 1 – 8, 10 – 15 and 17 - 44 are pending in the present application. Claims 9 and 16 are canceled by the present amendment. Reconsideration of the application is respectfully requested.

In the Office Action, section 2, claims 1 – 44 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,832,239 to Kraft et al. (hereinafter "the Kraft et al. patent"). The application contains nine independent claims, namely claims 1, 11, 13, 31, 32 and 41 – 44. Applicants are clarifying an aspect of claims 1, 11, 13, 31 and 41 – 44 that is not described by the Kraft et al. patent, and traversing the rejection of claim 32.

Note: Although Applicants are traversing the rejection of claim 32, Applicants are amending claim 32 to improve form and to correct grammar.

Claim 1 provides for a computing device. The computing device includes, *inter alia*, a receiver being arranged to receive a plurality of data requests from a plurality of data-receiving applications, and also to receive data from a store, wherein the plurality of data-receiving applications include a group identity in the plurality of data requests, thus indicating that the plurality of data requests form a request group. The computing device is arranged to identify data requests as belonging to the group by reading the group identity from the data requests.

The Kraft et al. patent describes a system that receives information resource requests, and matches up a group of information resource requests according to a resource identification included in each resource request (col. 3, lines 24 – 26). For example, with reference to FIG. 6, the Kraft et al. patent describes a schedule manager 604C that matches a request from a web client 608 to a group of requests on a basis of a uniform resource identifier (URI) in the request (col. 10, lines 47 – 59).

Thus, the system in the Kraft et al. patent groups requests based on an identification of a common resource. The Kraft et al. patent does not describe client 608 as having any knowledge of other clients,

or of being identified as a member of a group of clients having a group identity. Consequently, the Kraft et al. patent does not describe a plurality of **data-receiving applications include a group identity in the plurality of data requests**, thus indicating that the plurality of data requests form a request group, and a computing device arranged to identify data requests as belonging to the group **by reading the group identity** from the data requests. Accordingly, Applicants submit that the Kraft et al. patent does not anticipate claim 1.

Claims 11, 13, 31 and 41 – 44 each includes a recital similar to that of claim 1, as described above. Accordingly, claims 11, 13, 31 and 41 – 44, for reasons similar to that of claim 1, are also novel over the Kraft et al. patent.

Claim 32 provides for a data structure that includes, *inter alia*, a data-request group identity indicating membership of a group of a plurality of data-receiving applications and/or data-receiving devices forming a data-request group. Whereas, as explained above for claim 1, the system in the Kraft et al. patent groups requests based on an identification of a common resource, the Kraft et al. patent does not describe a data structure that includes, *inter alia*, a data-request **group identity indicating membership of a group** of a plurality of data-receiving applications and/or data-receiving devices forming a data-request group, as recited in claim 32.

Claims 2 – 8, 10 and 38 depend from claim 1. Claims 12 and 36 depends from claim 11. Claims 14, 15, 17 – 30 and 39 depend from claim 13. Claim 37 depends from claim 31. Claims 33 – 35 and 40 depend from claim 32. By virtue of these dependencies, claims 2 – 8, 10, 12, 14, 15, 17 – 30 and 33 – 40 are also novel over the Kraft et al. patent.

Several of the dependent claims, in addition to being novel because of their dependence on an underlying independent claim that is novel, include features that are further distinguishable over the Kraft et al. patent. Below, Applicants are briefly mentioning several of these features.

Claim 2 depends from claim 1 and further recites that the computing device is arranged such that an evaluation comprises postponing sending a single request until all requests within a request group have been received. The Kraft et al. patent does not describe clients 608 as being in an identified group, much less a group having any particular number of members. Moreover, in the Kraft et al. patent, requests are cached until a time threshold is exceeded (col. 11, lines 5 – 14). Consequently, the Kraft et al. patent does not describe postponing sending a single request **until all requests within a request group have been received**, as recited in claim 2.

With regard to claim 3, since, as mentioned above in the discussion of claim 2, in the Kraft et al. patent, requests are cached until a time threshold is exceeded, the Kraft et al. patent does not describe sending said single request **on receipt of the first request** within a request group, as recited in claim 3.

Claim 14 depends from claim 13, and further recites that the data-receiving applications are arranged to communicate with one another via inter data-receiving application messages. The Office Action suggests that the Kraft et al. patent, FIG. 9, discloses the features of claim 14. However, FIG. 9 is a flowchart of a process performed by schedule manger 604C (col. 12, lines 38 – 39), which is a part of proxy server component 604 (col. 9, lines 52; col. 10, lines 44 – 46). Therefore, FIG. 9 is not descriptive of communications between clients. The Kraft et al. patent does not appear to describe any communications between client 608 and another client to coordinate requests. Consequently, the Kraft et al. patent does not describe **data-receiving applications arranged to communicate with one another** via inter data-receiving application messages, a recited in claim 14.

With regard to claim 15, since, as explained above in the discussion of claim 14, the Kraft et al. patent does not appear to describe any communications between client 608 and another client to coordinate requests, the Kraft et al. patent does not describe a data-receiving application is arranged to generate and send a data-request to said data-processor following receipt of **an inter data-receiving application message**, as recited in claim 15.

With regard to claim 17, as explained above during the discussion of claim 2, the Kraft et al. patent does not describe clients 608 as being in an identified group, much less a group having any particular number of members. Consequently, the Kraft et al. patent does not describe data-receiving applications arranged to add to said data request one of the following: the **number of data-requests** that are to be made to said data-processor, in a data-request group; or **a list of the data-receiving applications/devices** that are to make a data-request to said data-processor, as recited in claim 17.

With regard to claim 19, since, as mentioned above in the discussion of claim 2, in the Kraft et al. patent, requests are cached until a time threshold is exceeded, the Kraft et al. patent does not describe a system in which said data-processor is arranged to transmit said single request **once said first data-request received** has been identified, as recited in claim 19.

With regard to claim 21, as explained above during the discussion of claim 2, the Kraft et al. patent does not describe clients 608 as being in an identified group, much less a group having any particular number of members, and in the Kraft et al. patent, requests are cached until a time threshold is exceeded. Consequently, the Kraft et al. patent does not describe a system in which said data-processor is arranged neither to transmit to said data store nor respond to said data-requests within a data-request group **until all data-requests in that data-request group have been received** thereby, as recited in claim 21.

With regard to claim 33, as explained above during the discussion of claim 2, the Kraft et al. patent does not describe clients 608 as being in an identified group, much less a group having any particular number of members. Consequently, the Kraft et al. patent does not describe the **number of data-requests that are to be made** to said data-processor in a data-request group; **a list of the data-receiving applications/devices** that are to make a data-request to said data-processor, as recited in claim 33.

Claims 9 and 16 are canceled. As such, the rejection thereof is rendered moot.

Applicants are requesting reconsideration and a withdrawal of the section 102(e) rejection of claims 1 – 44.

As mentioned above, Applicants are clarifying aspects of claims 1, 11, 13, 31 and 41 – 44, and amending claim 32 to improve form and correct grammar. Applicants are also amending claims 1, 11, 13, 31 and 41 – 44 to improve form and correct grammar.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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